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*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF HUNG G. TA IN  
OPPOSITION TO TRIGON TRADING'S  
MOTION TO SUBSTITUTE**

Date: March 7, 2019  
Time: 1:30 p.m.  
Crtrm: 3  
Judge: Hon. Richard Seeborg

1 I, HUNG G. TA, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), Co-Lead  
3 Counsel in this action. I am an active member in good standing of the bar of the State of New York  
4 and have been admitted *pro hac vice* in this matter. I submit this declaration in opposition to Trigon  
5 Trading’s Motion to Substitute.

6 2. Attached hereto as Exhibit A is a true and correct copy of the Joint Case Management  
7 Statement filed on December 14, 2018 in the *Tezos ICO Cases*, No. CJC-18-004978, Superior Court  
8 of California, San Francisco (Dkt. No. 27).

9 3. Attached hereto as Exhibit B is a true and correct copy of the complaint filed on April  
10 24, 2018 in *Trigon Trading Pty. Ltd, et. al. v. Dynamic Ledger Solutions, Inc., et al.*, No. 18CIV20145,  
11 Superior Court for the State of California, County of San Mateo (Dkt. No. 1).

12 4. Attached hereto as Exhibit C is a true and correct copy of Defendants’ Opposition to  
13 Plaintiffs’ Request for Leave to Add Plaintiff or, in the Alternative, The City of Dearborn Heights  
14 Act 345 Police & Retirement Systems’ Request to Intervene, filed on November 28, 2007 in *In re*  
15 *Impax Labs, Inc. Sec. Litig.*, No. C-04-4802-JW, United States District Court, Northern District of  
16 California (Dkt. No. 151).

17 5. Attached hereto as Exhibit D are true and correct copies of the following, filed on  
18 December 14, 2004 in *Morgan v. AXT, Inc.*, No. C04-04362 (MJJ), United States District Court,  
19 Northern District of California:

- 20 a. Notice of Motion and Motion for Consolidation, Appointment of Thomas O.  
21 Morgan as Lead Plaintiff and Approval of Selection of Lead Counsel and  
Memorandum of Points and Authorities in Support Thereof (Dkt. No. 6);
- 22 b. Notice of Motion and Motion of the Behm Plaintiffs Group for Consolidation of  
23 Related Actions, for Appointment as Lead Plaintiff and for Approval of Lead  
24 Plaintiff’s Selection of Co-Lead Counsel, without accompanying exhibits (Dkt.  
No. 9); and
- 25 c. Notice of Non-Opposition to Thomas O. Morgan’s Motion for Consolidation,  
26 Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel, without  
the accompanying proposed order (Dkt. No. 12).

27 6. Attached hereto as Exhibit E is a true and correct copy of the Non-Opposition to  
28 Christel Billhofer’s Motion for Appointment as Lead Plaintiff and for Approval of Selection of Lead

1 Counsel, filed on January 25, 2008 in *Billhofer v. Flamel Techs, SA*, No. 07-cv-09920, United States  
2 District Court, Southern District of New York (Dkt. No. 8).

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4 I declare under penalty of perjury that the foregoing is true and correct, this 13th day of  
5 February, 2019.

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7 /s/ Hung G. Ta

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